

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION – CINCINNATI

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19 JUN 14 PM 1:32

In re: : Case No. 18-13425
: :
Joshua V. Jones : Chapter 13
Amanda M. Jones :
Debtor(s) : Judge Hopkins
: **DEBTORS MOTION IN REQUEST FOR**
: **CONTINUANCE**
:

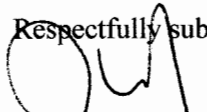
RICHARD JONES
CLERK OF COURT
U.S. BANKRUPTCY COURT
CINCINNATI, OHIO

Now come Joshua and Amanda Jones (“Debtors”) requesting this court for continuance. Debtor, Amanda Jones’ work schedule conflicts with current hearing scheduled for June 18, 2019, at 2:00pm. Amanda Jones has been unsuccessful in switching shifts with any fellow nurses at Cincinnati Children’s Hospital, and is scheduled to work during the scheduled hearing of Debtor’s counsel motion to withdraw.

Additionally, Debtor’s counsel, attorney Nicholas Zingarelli, has advised that Debtors can hire new legal counsel to attend the hearing in representation of Debtors. However, after speaking with numerous Bankruptcy attorneys in the local area, all attorneys have advised Debtors that representation is not permitted until the court releases Debtors current counsel, Nicholas Zingarelli.

In summary, Debtors object to defending themselves against current counsel, in hearing of Debtors current counsel motion to withdraw. In the event Debtors must represent themselves in hearing, Debtors hereby moves this honorable Court to grant motion of continuance.

Respectfully submitted,


Joshua V. Jones


Amanda M. Jones

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Debtors Motion in Request for Continuance was served by ordinary U.S. mail or via Electronic mail on June 13, 2019 to:

Zingarelli Law Office
810 Sycamore Street, Third Floor
Cincinnati, Ohio 45202

Margaret A. Burks
Chapter 13 Trustee
600 Vine Street, Suite 2200
Cincinnati, Ohio 45202